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May 22, 2023

**VIA ECF**

The Honorable Ann M. Donnelly  
United States District Judge  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Henkin, et al. v. Qatar Charity, et al.*, 1:21-cv-05716-AMD-VMS—  
Letter Regarding Supplemental Authority**

Dear Judge Donnelly:

On behalf of defendants Qatar Charity and Masraf Al Rayan (“Defendants”), we respectfully write to notify the Court of the following supplemental authority in further support of the Defendants’ Motions to Dismiss (ECF Nos. 56, 58): *Twitter, Inc. v. Taamneh, et al.*, No. 21-1496, --- S.Ct. ---- (May 18, 2023).

On May 18, 2023, the U.S. Supreme Court issued its decision in *Twitter, Inc. v. Taamneh, et al.*, a case considering the meaning of “aiding and abetting” an act of international terrorism under JASTA. *Twitter, Inc. v. Taamneh, et al.*, No. 21-1496, --- S.Ct. ---- (2023) (holding aiding and abetting an act of international terrorism requires a defendant consciously and culpably participate in the wrongful act giving rise to plaintiffs’ claims). A copy of the decision is attached as **Exhibit A**.

Respectfully submitted,

/s/ John M. Hillebrecht  
John M. Hillebrecht

*Counsel for Qatar Charity*

Encl.

cc: All counsel of record (by ECF)